

## Remarks

[0001] Herein, the "Action" or "Office Action" refers to the non-final Office Action dated April 4, 2007.

[0002] Applicant respectfully requests reconsideration and allowance of all pending claims of the application. Claims 1-18 and 21-34 are presently pending. Claims 1-17, 21, 25, and 31 are amended herein. Claims withdrawn or canceled herein are 19, 20 and 35-37. New claims added herein are None.

## **Substantive Claim Rejections**

### **35 U.S.C. §101 Claim Rejections**

[0003] Claims 1-20 and 25-37 are rejected under 35 USC §101 as being non-statutory for various reasons (*Office Action*, pp.2-3). More specifically, the Office indicates that claims 1-4, 5-12, 16-20, 25-30, and 35-37 are not statutory because these claims fail to establish a statutory category of invention, have no tangible result and no practical application, and are directed to software per se and are not tangibly embodied in a manner that is executable (*Office Action*, pp.2-3). The Office indicates that claims 31-34 are not statutory because these claims fail to establish a statutory category of invention, because the claims have no tangible result and no practical application (*Office Action*, p.3). Claims 19, 20 and 35-37

are canceled herein, accordingly, the 35 USC §101 rejections of claims 19, 20 and 35-37 are moot.

**[0004]** Applicant respectfully traverses each of the remaining §101 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein. Each of these different §101 rejections are addressed below:

**[0005]** Regarding **claims 1-4, 5-12, 16-18, and 25-30**: The Office indicates that these claims which recite “processor readable media” recite software per se and are not limited to tangible embodiments in a manner that is executable (*Office Action*, pp.2-3).

**[0006]** Appropriate amendments are made herein to each of the claims which recite “processor readable media” comprising processor-executable instructions. Applicant has amended the claims to clearly recite “processor readable storage media” and has amended the specification to make it clear that the claimed subject matter is limited to tangible embodiments in a manner that is executable.

**[0007]** Accordingly, Applicant respectfully requests that the §101 rejection of claims 1-4, 5-12, 16-18, and 25-30 be withdrawn.

**[0008]** Regarding **claims 1-4, 5-12, 16-18, 25-30, and 31-34**: The Office indicates that these claims are not statutory for

failing to recite a tangible result and have no practical application (*Office Action*, pp.2-3).

**[0009]** Regarding claims 1-4: Applicant has amended independent claim 1 so that it now clearly recites a tangible result and practical application. More specifically, claim 1 has been amended to now recite in part, "after dynamically loading the new filter into the filter graph, processing the data stream through the filter graph which includes the new filter; and communicating information represented by the data stream to the user via the media player." Communicating information represented by the data stream to the user via the media player after the data stream has been processed through the filter graph (which includes the new filter) is clearly a practical application with a tangible result thereby satisfying the requirements of §101.

**[0010]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 1, and of claims 2-4 which depend therefrom (either directly or indirectly) be withdrawn.

**[0011]** Regarding claims 5-15: Applicant has amended independent claim 5 so that it now clearly recites a tangible result and practical application. More specifically, claim 5 has been amended to now recite in part, "after dynamically loading the new filter into the filter graph, processing the data stream through the filter graph which includes the new filter; and communicating

information represented by the data stream to the user via the media player.” Communicating information represented by the data stream to the user via the media player after the data stream has been processed through the filter graph (which includes the new filter) is clearly a practical application with a tangible result thereby satisfying the requirements of §101.

**[0012]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 5, and of claims 6-15 which depend therefrom (either directly or indirectly) be withdrawn.

**[0013]** Regarding claims 16-18: Applicant has amended independent claim 16 so that it now clearly recites a tangible result and practical application. More specifically, claim 16 has been amended to now recite in part, “[a] processor-readable storage medium having stored thereon a data structure that describes registration parameters which register a new filter with a media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on the registration parameters stored in a registry and loaded in response to an instruction from a user, and such that the new filter cannot subsequently be pirated for use on other types of media players, the data structure comprising.” Registering a new filter with a media player when the new filter is installed, so that the new filter can be recognized by the media player for loading based on the registration parameters stored in a registry, and so that the new filter cannot

subsequently be pirated for use on other types of media players is clearly a practical application with a tangible result, thereby satisfying the requirements of §101. Further, amended claim 16 clearly indicates that the data structure is embodied in processor-readable storage medium, and further recites structural and functional interrelationships between the data structure and the computer software and hardware components which permit the data structure's functionality to be realized.

**[0014]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 16, and of claims 17 and 18 which depend therefrom (either directly or indirectly) be withdrawn.

**[0015]** Regarding claims 21-24: Applicant has amended independent claim 21 so that it now clearly recites a tangible result and practical application. More specifically, claim 21 which recites a method has been amended to now recite in part, "after dynamically loading the new filter into the filter graph, processing the data stream through the filter graph which includes the new filter; and communicating information represented by the data stream to the user via the media player." Communicating information represented by the data stream to the user via the media player after the data stream has been processed through the filter graph is clearly a practical application with a tangible result thereby satisfying the requirements of §101.

**[0016]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 21, and of claims 23 and 24 which depend therefrom (either directly or indirectly) be withdrawn.

**[0017]** Regarding **claims 25-30**: Applicant has amended independent claim 25 so that it now clearly recites a tangible result and practical application. Amended claim 25 recites in part “[a] computer comprising: one or more processors; a registration function which executes on the one or more processors to receive a set of registration parameters from a filter plug-in which has been selected by a user for use in processing a data stream, the registration parameters comprising...” As such, amended claims 25 recites a physical article or object (e.g., one or more processors) and therefore constitutes a machine or article of manufacture within the meaning of 35 USC §101, and the registration function which executes on the one or more processors to receive a set of registration parameters from a filter plug-in which has been selected by a user for use in processing a data stream is a tangible result and practical application.

**[0018]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 25, and of claims 26-30 which depend therefrom (either directly or indirectly) be withdrawn.

**[0019]** Regarding **claims 31-34**: Applicant has amended independent claim 31 so that it now clearly recites a tangible result

and practical application. More specifically, claim 31 has been amended to now recite in part, "means for processing the data stream through the filter graph which includes the new filter; and means for communicating information represented by the data stream to the user via the media player." Communicating information represented by the data stream to the user via the media player after the data stream has been processed through the filter graph (which includes the new filter) is clearly a practical application with a tangible result thereby satisfying the requirements of §101.

**[0020]** Accordingly, Applicant respectfully requests that the §101 rejection of independent claim 31, and of claims 32-24 which depend therefrom (either directly or indirectly) be withdrawn.

### **35 U.S.C. §102 Claim Rejections**

**[0021]** Claims 1, 21, 31, and 35 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,983,464 to Bhattacharya et al. (hereinafter, "Bhattacharya") (*Office Action*, p.3).

**[0022]** Claims 1-37 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,298,370 to Tang et al. (hereinafter, "Tang") (*Office Action*, p.5).

**[0023]** Claims 19, 20 and 35-37 are canceled herein, accordingly, the 35 USC §102 rejections of claims 19, 20 and 35-37 are moot. Applicant respectfully traverses the remaining §102 rejections, and requests reconsideration and allowance in light of the comments and amendments contained herein. Accordingly, Applicant requests that the rejections be withdrawn and that the case be passed along to issuance.



**[0024]**     **Claim 1** recites a processor-readable storage medium comprising processor-executable instructions to be executed by one or more processors to perform a method comprising:

constructing a filter graph to process a data stream from a source file which is received by a media player;

processing the data stream through the filter graph;

receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream;

registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players;

recognizing the new filter based on the registration parameters stored in the registry;

dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user;

after dynamically loading the new filter into the filter graph, processing the data stream through the filter graph which includes the new filter; and

communicating information represented by the data stream to the user via the media player.

### **§102 Rejection of Claim 1 - based on Bhattacharya**

**[0025]**     In order for Bhattacharya to anticipate this claim, Applicant submits that Bhattacharya must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that Bhattacharya does not disclose all of the claimed elements and

features of amended claim 1. For example, Bhattacharya does not show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream", as recited in claim 1.

**[0026]** Instead, Bhattacharya describes a method to dynamically reconfigure multimedia data processing modules when a reconfiguration has become necessary due to a dynamic format change of the streaming media (*Bhattacharya*, col.6 lns.33-38). For example, when there has been a change in the type of input data, a current video decompression filter must be replaced with a different decompression filter.

**[0027]** Bhattacharya describes that a filter graph manager 122 automatically creates a filter graph by invoking appropriate filters, and connecting the appropriate pins, and that reconfigurations of filters and pins are done to process multimedia data which dynamically keeps changing formats (*Bhattacharya*, col.5 lns.60-66). Bhattacharya describes that these reconfigurations are initiated by a processing module in a stream or by an application by sending a notification packet through the processing modules in the portion of the stream being changed (*Bhattacharya*, Abstract). Modules affected by the change are stopped from further processing and new modifications are introduced in the filter graph to facilitate seamless processing of the streaming multimedia data.

**[0028]** To support its assertion of anticipation, the Office cites to several sections of Bhattacharya (*Office Action* p.4; *Bhattacharya*, Abstract, col.5 ln.60 to col.6 ln.20, and col.9 lns.27-60). However, none of the cited sections show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream", as recited in claim 1. Instead, Bhattacharya describes that these reconfigurations are initiated by a processing module in a stream or by an application by sending a notification packet through the processing modules in the portion of the stream being changed. (*Bhattacharya*, Abstract, and col.2 lns.17-20).

**[0029]** Further, Bhattacharya does not show or disclose "registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players", as recited in claim 1.

**[0030]** To support its assertion of anticipation with regard to this element, the Office cites to column 9 lines 27-60 of Bhattacharya, apparently arguing that such is inherent in the cited section (*Office Action* p.4; *Bhattacharya*, col.9 lns.27-60). The cited section describes reconfiguring a filter graph as directed by the filter graph manager (*Bhattacharya*, col.9 lns.27-60). However, the cited section does not show or disclose "registering the new filter with the media

player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players”, as recited in claim 1.”

**[0031]** Still further, Bhattacharya does not show or disclose “dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user”, as recited in claim 1. Instead, Bhattacharya describes reconfigurations of a filter graph which are initiated by a processing module in a stream (*Bhattacharya*, Abstract, and col.2 lns.17-20).

**[0032]** Accordingly, claim 1 is allowable over Bhattacharya for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

### **§102 Rejection of Claim 1 - based on Tang**

**[0033]** In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that Tang does not disclose all of the claimed elements and features of claim 1. For example,

Tang does not show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream", as recited in claim 1.

**[0034]** Instead, Tang describes a process of operating a computer system that includes storage for holding an operating system and an application program and a set of two processors having different instruction sets (*Tang*, Abstract). The process includes steps of: (i) running some of the operating system on the first processor so that this processor sets up a second processor object for a part of the application and (ii) concurrently running the second processor to access the second processor object and therefore determining the operations for the second processor to access second processor instructions for processing parts of the application program.

**[0035]** Tang describes an active X filter graph manager which controls the data structure of the filter graph and the way data moves through the filter graph (*Tang*, col.48 lns.49-66). The filter graph manager provides a set of component object model (COM) which interfaces for communication between a filter graph and its application (*Tang*, col.48 lns.49-66). Further, Tang describes the control of data stream using IMedia Control interface. ActiveDSP is a set of VSP accelerated filters managed by filter graph manager of ActiveX and timesaving software for microcontrollers and digital

signal processors (*Tang*, col.48 Ins.49-66). *Tang* describes that an ActiveDSP filter graph has a transformation filter block which divides audio/video data, decodes the media file, converts the data format and synthesizes the data (*Tang*, col.48 Ins.49-66).

**[0036]** To support its assertion of anticipation, the Office cites to several sections of *Tang* (*Office Action* p.5; *Tang*, Abstract, col.115 Ins.30-40, col.128 Ins.12-35, col.129 Ins.3-25, and col.130 Ins.20-35). However, none of the cited sections show or disclose “receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream”, as recited in claim 1. Instead, *Tang* describes an active X filter graph manager which controls the data structure of the filter graph and the way data moves through the filter graph (*Tang*, col.48 Ins.49-66).

**[0037]** Further, *Tang* does not show or disclose “registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players”, as recited in claim 1.

**[0038]** To support its assertion of anticipation with regard to this element, the Office cites to col.129 Ins.3-25 and col.130 Ins.20-35 of *Tang*, (*Office Action* p.5; *Tang*, col.129 Ins.3-25 and col.130

Ins.20-35). The cited sections describe a process embodiment for dynamic balancing of some system embodiments (*Tang*, col.129 Ins.3-25 and Fig. 119) and provide an example of how an application can call an API to perform various applications, wherein the applications call one or more functions (*Tang*, col.130 Ins.20-35 and Fig. 120). However, the cited section does not show or disclose “registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players”, as recited in claim 1.”

**[0039]** Still further, *Tang* does not show or disclose “dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user”, as recited in claim 1. Instead, *Tang* describes an active X filter graph manager which controls the data structure of the filter graph and the way data moves through the filter graph (*Tang*, col.48 Ins.49-66).

**[0040]** Accordingly, claim 1 is allowable over *Tang* for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

**[0041]**     **Claims 2-4** are allowable by virtue of their dependency upon claim 1 (either directly or indirectly). Additionally, some or all of claims 2-4 may be allowable over Tang for independent reasons.

**§102 Rejection of Claim 5 - based on Tang**

**[0042]**     In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim.

**[0043]**     Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of claim 1, Tang does not disclose all of the claimed elements and features of claim 5. For example, Tang does not show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter modifies the data of the data stream" and "receiving a call to register a plug-in when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players" as recited in claim 5. Further, Tang does not show or disclose receiving the set of registration parameters which are recited in claim 5.



[0044] Accordingly, claim 5 is allowable over Tang for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

[0045] Claims 6-15 are allowable by virtue of their dependency upon claim 5 (either directly or indirectly). Additionally, some or all of claims 6-15 may be allowable over Tang for independent reasons.

**§102 Rejection of Claim 16 - based on Tang**

[0046] In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim.

[0047] Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of claim 1, Tang does not disclose all of the claimed elements and features of claim 16. For example, Tang does not show or disclose "[a] processor-readable storage medium having stored thereon a data structure that describes registration parameters which register a new filter with a media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on the registration parameters stored in a registry and

loaded in response to an instruction from a user, and such that the new filter cannot subsequently be pirated for use on other types of media players” as recited in claim 16. Further, Tang does not show or disclose the data structure as recited in claim 16.

**[0048]** Accordingly, claim 16 is allowable over Tang for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

**[0049]** **Claims 17 and 18** are allowable by virtue of their dependency upon claim 16 (either directly or indirectly). Additionally, one or both of claims 17 and 18 may be allowable over Tang for independent reasons.

**[0050]**     **Claim 21** recites a method comprising:

- receiving streaming data at a media player;
- constructing a filter graph based on a data type of the streaming data received at the media player, wherein the streaming data is in a format known to the media player;
- processing the streaming data through the filter graph;
- receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies the streaming data;
- registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players;
- recognizing the new filter based on the registration parameters stored in the registry;
- dynamically loading the new filter into the filter graph during the processing of the streaming data through the filter graph in response to the instruction received from the user;
- after dynamically loading the new filter into the filter graph, processing the data stream through the filter graph which includes the new filter; and
- communicating information represented by the data stream to the user via the media player.

**§102 Rejection of Claim 21 - based on Bhattacharya**

**[0051]**     In order for Bhattacharya to anticipate this claim, Applicant submits that Bhattacharya must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim.

**[0052]**     Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of

claim 1, Bhattacharya does not disclose all of the claimed elements and features of claim 21. For example, Bhattacharya does not show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies the streaming data", as recited in claim 21. Further, Bhattacharya does not show or disclose "registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players", as recited in claim 21. Still further, Bhattacharya does not show or disclose "dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user", as recited in claim 21.

**[0053]** Accordingly, claim 21 is allowable over Bhattacharya for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

#### **§102 Rejection of Claim 21 - based on Tang**

**[0054]** In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature

of the claim and that they must be arranged in the same manner as the claim.

**[0055]** Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of claim 1, Tang does not disclose all of the claimed elements and features of claim 21. For example, Tang does not show or disclose "receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies the streaming data", as recited in claim 21. Further, Tang does not show or disclose "registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players", as recited in claim 21. Still further, Tang does not show or disclose "dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user", as recited in claim 21.

**[0056]** Accordingly, claim 21 is allowable over Tang for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

**[0057]** **Claims 22-24** are allowable by virtue of their dependency upon claim 21 (either directly or indirectly).

Additionally, some or all of claims 22-24 may be allowable over Tang for independent reasons.

**[0058]**     **Claim 25** recites a computer comprising:

- one or more processors;
- a registration function which executes on the one or more processors to receive a set of registration parameters from a filter plug-in which has been selected by a user for use in processing a data stream, the registration parameters comprising:
  - a pwszFriendlyName parameter designating a name for the plug-in;
  - a pwszDescription parameter designating a description of the plug-in;
  - a pwszUninstallString parameter designating an uninstall string for uninstalling the plug-in;
  - a dwPriority parameter designating an integer value containing a priority position of the plug-in in a chain of currently enabled plug-ins;
  - a guidPluginType parameter designating a globally unique identifier that specifies a type for the plug-in;
  - a Clsid parameter designating a class identifier of the plug-in;
  - a cMediaType parameter designating a count of media types supported by the plug-in; and
  - a pMediaType parameter designating a pointer to an array of media types that enumerates supported media types for the plug-in.

### **§102 Rejection of Claim 25 - based on Tang**

**[0059]**     In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim. Applicant respectfully submits that Tang does not disclose

all of the claimed elements and features of claim 25. For example, Tang does not show or disclose “a registration function which executes on the one or more processors to receive a set of registration parameters from a filter plug-in which has been selected by a user for use in processing a data stream”, as recited in claim 25. Instead, Tang describes an active X filter graph manager which controls the data structure of the filter graph and the way data moves through the filter graph (*Tang*, col.48 lns.49-66). Further, Tang does not show or disclose the registration parameters as recited in claim 25.

**[0060]** Accordingly, claim 25 is allowable over Tang for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

**[0061]** **Claims 26-30** are allowable by virtue of their dependency upon claim 25 (either directly or indirectly). Additionally, some or all of claims 26-30 may be allowable over Tang for independent reasons.

**[0062]**     **Claim 31** recites a computer comprising:

means for constructing a filter graph to process a data stream from a source file which is received by a media player;  
means for processing the data stream through the filter graph;

means for receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies data of the data stream;

means for registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter can not subsequently be pirated for use on other types of media players;

means for recognizing the new filter based on the registration parameters stored in the registry; and

means for dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user;

means for processing the data stream through the filter graph which includes the new filter; and

means for communicating information represented by the data stream to the user via the media player.

### **§102 Rejection of Claim 31 - based on Bhattacharya**

**[0063]**     In order for Bhattacharya to anticipate this claim, Applicant submits that Bhattacharya must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim.



**[0064]** Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of claim 1, Bhattacharya does not disclose all of the claimed elements and features of claim 31. For example, Bhattacharya does not show or disclose "means for receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies the streaming data", as recited in claim 31. Further, Bhattacharya does not show or disclose "means for registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players", as recited in claim 31. Still further, Bhattacharya does not show or disclose "means for dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user", as recited in claim 31.

**[0065]** Accordingly, claim 31 is allowable over Bhattacharya for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

### **§102 Rejection of Claim 31 - based on Tang**

**[0066]** In order for Tang to anticipate this claim, Applicant submits that Tang must disclose each and every element and feature of the claim and that they must be arranged in the same manner as the claim.

**[0067]** Applicant respectfully submits that based on argument similar to those presented above in response to the rejection of claim 1, Tang does not disclose all of the claimed elements and features of claim 31. For example, Tang does not show or disclose "means for receiving an instruction from a user to load a new filter into the filter graph, wherein the new filter is new to the media player and modifies the streaming data", as recited in claim 31. Further, Tang does not show or disclose "means for registering the new filter with the media player when the new filter is installed, such that the new filter can be recognized by the media player for loading based on registration parameters stored in a registry, and such that the new filter cannot subsequently be pirated for use on other types of media players", as recited in claim 31. Still further, Tang does not show or disclose "means for dynamically loading the new filter into the filter graph during the processing of the data stream through the filter graph in response to the instruction received from the user", as recited in claim 31.

**[0068]** Accordingly, claim 31 is allowable over Tang for at least these reasons, and Applicant respectfully requests that the §102 rejection be withdrawn.

**[0069]** **Claims 32-34** are allowable by virtue of their dependency upon claim 31 (either directly or indirectly). Additionally, some or all of claims 32-34 may be allowable over Tang for independent reasons.

### **Dependent Claims**

**[0070]** In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

## **Conclusion**

**[0071]** All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: 7-14-2007

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